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REFER TO OUR FILE #: 110339-01

May 11, 2020

Honorable John K. Sherwood
United States Bankruptcy Court
District of New Jersey
MLK Jr. Federal Building
50 Walnut Street
Newark, NJ 07102

Re: In Re: New England Motor Freight Inc., et al.
Case No.: 19-12809 (JKS)

Dear Judge Sherwood:

Pursuant to the ADR procedures set forth in Exhibits B to the "summary of the auto liability protocol set forth in the debtors in the official committee of unsecured creditors joint combined plan of liquidation and disclosure statement plaintiff creditor Joseph Varsick hereby demands mandatory mediation as set forth in Section C(4) to Exhibit B as aforesaid. It is our understanding that upon filing this mediation quest of the auto liability claim shall automatically be referred to mandatory, nonbinding mediation without further order or action of the bankruptcy court. By copy of this letter to counsel representing the holder of the auto liability claim we request mediation be arranged as soon as is practical to all parties as set forth in Section C(5). The parties have already conducted informal settlement negotiations as directed despite the "Covid19" situation and have failed to reach agreement.

I thank you all in advance for your courtesies and consideration.

Very truly yours,

FINKELSTEIN & PARTNERS, LLP

BY: JAMES W. SHUTTLEWORTH, III, ESQ.

/mam

cc: Brian Matthews/Stuart Miller (via email: Brian.Matthews@WilsonElser.com)